

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

HORACE MORRIS, et al.

Civil Docket Number: 18-cv-05321

PLAINTIFFS,

FIRST NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 6 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

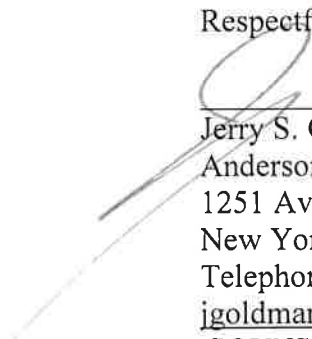
	New Plaintiff's Name (alphabetical by last name)	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05321
100	Morris, Dahlia	D.C.	United States	Morris, Odessa V.	Daughter	¶ 1
101	Morris, Jan-Sheri	MD	United States	Morris, Odessa V.	Daughter	¶ 1
102	Lamb, Winford F.	MD	United States	Morris, Odessa V.	Brother	¶ 1

	New Plaintiff's Name (alphabetical by last name)	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05321
103	Morris, Keith	MD	United States	Morris, Odessa V.	Son	¶ 1
104	Morrone, Gregory	NJ	United States	Morrone, Ferdinand	Son	¶ 2
105	Morrone, Ferdinand	GA	United States	Morrone, Ferdinand	Son	¶ 2
106	Morrone, Alyssa	FL	United States	Morrone, Ferdinand	Daughter	¶ 2
107	Moussa, Mazen	El Kura, Lebanon	Lebanon	Moussa, Jude	Brother	¶ 3
108	Moussa, Michael	El Kura, Lebanon	Lebanon	Moussa, Jude	Brother	¶ 3
109	Moussa, Joseph	El Kura, Lebanon	Lebanon	Moussa, Jude	Father	¶ 3
110	Moussa, Yvette	El Kura, Lebanon	Lebanon	Moussa, Jude	Mother	¶ 3
111	Mowatt, Andre	NY	United States	Mowatt, Damion	Brother	¶ 4
112	Mowatt, Deval	NY	Jamaica	Mowatt, Damion	Brother	¶ 4
113	Mowatt, Devon	NY	Jamaica	Mowatt, Damion	Father	¶ 4
114	Mulligan, Kevin	NY	United States	Mulligan, Dennis M.	Brother	¶ 11
115	Mulligan, Michael	CT	United States	Mulligan, Dennis M.	Brother	¶ 11
116	Mulligan, Brian	NY	United States	Mulligan, Dennis M.	Brother	¶ 11
117	Murray Waldman, Valerie	NY	United States	Murray, Valerie V.	Daughter	¶ 12
118	Stinga, Veronica	NY	United States	Murray, Valerie V.	Daughter	¶ 12
119	Murray, Timothy	NY	United States	Murray, Valerie V.	Son	¶ 12
120	Nedd, Jerrell	NY	United States	Nedd, Jerome O.	Son	¶ 14
121	Nedd, Jerome	NY	United States	Nedd, Jerome O.	Son	¶ 14

	New Plaintiff's Name (alphabetical by last name)	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05321
122	Nesbitt-Arneaud, Jocelyn	WI	Trinidad	Nesbitt, Oscar F.	Sister	¶ 16
123	Nesbitt, Earlick	NY	Trinidad	Nesbitt, Oscar F.	Brother	¶ 16
124	Nesbitt, John	WI	Trinidad	Nesbitt, Oscar F.	Brother	¶ 16

Dated: June 26, 2018

Respectfully submitted,


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 COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman